RATING ACTION COMMENTARY

Fitch Affirms Paragon Mortgages No. 12 and 14

Wed 26 May, 2021 - 12:40 PM ET

Fitch Ratings - London - 26 May 2021: Fitch Ratings has affirmed Paragon Mortgages No. 12 and 14 as detailed below.

| RATING ACTIONS | | | | | |
|--------------------------------------|--------|-----------------------------|----------|-----------------------------------|---|
| ENTITY/DEBT | RATING | | | PRIOR | |
| Paragon Mortgages (No. 14) PLC | | | | | |
| • Class A1 69913FAA5 | LT | AAAsf Rating Outlook Stable | Affirmed | AAAsf Rating Outlook Stable | |
| • Class A2a XS0291722931 | LT | AAAsf Rating Outlook Stable | Affirmed | AAAsf Rating Outlook Stable | |
| • Class A2b XS0291723400 | LT | AAAsf Rating Outlook Stable | Affirmed | AAAsf Rating Outlook Stable | |
| Class A2c | LT | AAAsf Rating Outlook Stable | Affirmed | AAAsf Rating | • |

VIEW ADDITIONAL RATING DETAILS

In relation to Paragon Mortgages No. 12 and 14 C1b-CSO, Fitch's Global Structured Finance Rating Criteria expect a rating action on a note tranche to result in

TRANSACTION SUMMARY

Paragon Mortgages No.12 and 14 are buy-to-let (BTL) RMBS transactions backed by loans originated between 2005 and 2007 by Paragon Mortgages Limited and Mortgage Trust Limited, subsidiaries of The Paragon Banking Group.

KEY RATING DRIVERS

Coronavirus-related Alternative Assumptions

Fitch applied alternative coronavirus assumptions to the mortgage portfolio (see EMEA RMBS: Criteria Assumptions Updated due to Impact of the Coronavirus Pandemic).

The combined application of revised 'Bsf' representative pool weighted average foreclosure frequency (WAFF) and revised rating multiples resulted in a 'Bsf' multiple to the current FF assumptions of 1.1x for Paragon 12 and Paragon 14 and no impact at 'AAAsf'. The alternative coronavirus assumptions are more modest for higher rating levels as the corresponding rating assumptions are already meant to withstand more severe shocks.

Stable Asset Performance

Loans with arrears greater than three months for both Paragon 12 and Paragon 14 asset pools have remained very low at 0.57% (30 April 2021) and 0.32% (28 February 2021), respectively. Borrowers in arrears by more than two months are predominantly managed by Paragon via its receiver of rent policy, where the full rental stream is diverted to Paragon, as administrator, and used towards arrears reduction. Paragon's extensive use of its receiver of rent strategy has limited the level of delinquencies seen across the Paragon series of transactions.

Rating Cap for Junior Notes

The only credit enhancement (CE) available to the junior notes of Paragon 12 and 14 is in the form of the first loss fund, which can either be invested in authorised investments or be held in the transaction account at Barclays Bank plc. As a result, these notes are capped at Barclays Bank plc's 'A+' Long-Term Issuer Default Rating (IDR). Fitch affirmed

Fitch Ratings Interest-Only Concentration

The transactions have a material concentration of interest-only (IO) loans maturing within a three-year period during the lifetime of the transaction, peaking at 46.3% between 2029-2031 for Paragon 12 and 53.2% between 2030-2032 for Paragon 14. Where a concentration is present, Fitch will derive IO concentration's WAFF and apply the higher of IO concentration WAFF and the standard portfolio WAFF for each rating level in the analysis. For these pools, Fitch has applied the FF based on the IO concentration WAFF.

RATING SENSITIVITIES

Factors that could, individually or collectively, lead to negative rating action/downgrade:

The transactions' performance may be affected by changes in market conditions and economic environment. Weakening economic performance is strongly correlated to increasing levels of delinquencies and defaults that could reduce CE available to the notes. We tested a 15% increase in WAFF and a 15% decrease in WARR. The results indicate an adverse rating impact of up to three notches for Paragon 12 and up to two notches for Paragon 14.

Additionally, unanticipated declines in recoveries could also result in lower net proceeds, which may make certain notes' ratings susceptible to negative rating action depending on the extent of the decline in recoveries. Fitch conducts sensitivity analyses by stressing both a transaction's base-case FF and RR assumptions, and examining the rating implications on all classes of issued notes.

The class C notes of Paragon 12 and 14 are capped at Barclays' Long-Term IDR, which currently has a Negative Outlook, indicating an increased probability of negative rating action.

Factors that could, individually or collectively, lead to rating positive action/upgrade:

The ratings for Paragon 12 and 14 class A and B notes are currently at their highest level on Fitch's rating scale and cannot be upgraded. The ratings for Paragon 12 and 14 class C notes could be upgraded only on a combination of an upgrade to Barclays Bank plc's

BEST/WORST CASE RATING SCENARIO

International scale credit ratings of Structured Finance transactions have a best-case rating upgrade scenario (defined as the 99th percentile of rating transitions, measured in a positive direction) of seven notches over a three-year rating horizon; and a worstcase rating downgrade scenario (defined as the 99th percentile of rating transitions, measured in a negative direction) of seven notches over three years. The complete span of best- and worst-case scenario credit ratings for all rating categories ranges from 'AAAsf' to 'Dsf'. Best- and worst-case scenario credit ratings are based on historical performance. For more information about the methodology used to determine sectorspecific best- and worst-case scenario credit ratings, visit https://www.fitchratings.com/site/re/10111579.

USE OF THIRD PARTY DUE DILIGENCE PURSUANT TO SEC RULE 17G -10

Form ABS Due Diligence-15E was not provided to, or reviewed by, Fitch in relation to this rating action.

DATA ADEQUACY

Fitch has checked the consistency and plausibility of the information it has received about the performance of the asset pools and the transactions. Fitch has not reviewed the results of any third-party assessment of the asset portfolio information or conducted a review of origination files as part of its ongoing monitoring.

Fitch did not undertake a review of the information provided about the underlying asset pools ahead of the transaction's initial closing. The subsequent performance of the transactions over the years is consistent with the agency's expectations given the operating environment and Fitch is therefore satisfied that the asset pool information relied upon for its initial rating analysis was adequately reliable.

Overall, and together with any assumptions referred to above, Fitch's assessment of the information relied upon for the agency's rating analysis according to its applicable rating methodologies indicates that it is adequately reliable.



The principal sources of information used in the analysis are described in the Applicable Criteria.

PUBLIC RATINGS WITH CREDIT LINKAGE TO OTHER RATINGS

The class C notes of Paragon 12 and 14 are credit-linked to and capped at Barclays' 'A+' Long-Term IDR.

ESG CONSIDERATIONS

Unless otherwise disclosed in this section, the highest level of ESG credit relevance is a score of '3'. This means ESG issues are credit-neutral or have only a minimal credit impact on the entity, either due to their nature or the way in which they are being managed by the entity. For more information on Fitch's ESG Relevance Scores, visit www.fitchratings.com/esg

FITCH RATINGS ANALYSTS

Sara Mariani

Associate Director
Surveillance Rating Analyst
+44 20 3530 1540
Fitch Ratings Ltd
30 North Colonnade, Canary Wharf London E14 5GN

Duncan Paxman

Senior Director
Committee Chairperson
+44 20 3530 1428

MEDIA CONTACTS

Athos Larkou

London

+44 20 3530 1549

athos.larkou@thefitchgroup.com

Structured Finance and Covered Bonds Counterparty Rating Criteria (pub. 29 Jan 2020)

Structured Finance and Covered Bonds Counterparty Rating Criteria: Derivative Addendum (pub. 29 Jan 2020)

UK RMBS Rating Criteria (pub. 02 Jul 2020) (including rating assumption sensitivity)

Structured Finance and Covered Bonds Country Risk Rating Criteria (pub. 23 Sep 2020)

Structured Finance and Covered Bonds Interest Rate Stresses Rating Criteria (pub. 13 Nov 2020)

Global Structured Finance Rating Criteria (pub. 24 Mar 2021) (including rating assumption sensitivity)

APPLICABLE MODELS

Numbers in parentheses accompanying applicable model(s) contain hyperlinks to criteria providing description of model(s).

Multi-Asset Cash Flow Model, v2.9.0 (1)

ResiGlobal Model: UK, v1.2.2 (1)

ADDITIONAL DISCLOSURES

Dodd-Frank Rating Information Disclosure Form

Solicitation Status

Endorsement Policy

ENDORSEMENT STATUS

Paragon Mortgages (No. 12) Plc Paragon Mortgages (No. 14) PLC UK Issued, EU Endorsed UK Issued, EU Endorsed

DISCLAIMER

ALL FITCH CREDIT RATINGS ARE SUBJECT TO CERTAIN LIMITATIONS AND DISCLAIMERS. PLEASE READ THESE LIMITATIONS AND DISCLAIMERS BY FOLLOWING THIS LINK:

HTTPS://WWW.FITCHRATINGS.COM/UNDERSTANDINGCREDITRATINGS. IN ADDITION, THE FOLLOWING HTTPS://WWW.FITCHRATINGS.COM/RATING-

AVAILABLE FROM THIS SITE AT ALL TIMES. FITCH'S CODE OF CONDUCT,
CONFIDENTIALITY, CONFLICTS OF INTEREST, AFFILIATE FIREWALL, COMPLIANCE,
AND OTHER RELEVANT POLICIES AND PROCEDURES ARE ALSO AVAILABLE FROM
THE CODE OF CONDUCT SECTION OF THIS SITE. DIRECTORS AND
SHAREHOLDERS RELEVANT INTERESTS ARE AVAILABLE AT
HTTPS://WWW.FITCHRATINGS.COM/SITE/REGULATORY. FITCH MAY HAVE
PROVIDED ANOTHER PERMISSIBLE SERVICE TO THE RATED ENTITY OR ITS
RELATED THIRD PARTIES. DETAILS OF THIS SERVICE FOR WHICH THE LEAD
ANALYST IS BASED IN AN ESMA- OR FCA-REGISTERED FITCH RATINGS COMPANY
(OR BRANCH OF SUCH A COMPANY) CAN BE FOUND ON THE ENTITY SUMMARY
PAGE FOR THIS ISSUER ON THE FITCH RATINGS WEBSITE.

READ LESS

COPYRIGHT

Copyright © 2021 by Fitch Ratings, Inc., Fitch Ratings Ltd. and its subsidiaries. 33 Whitehall Street, NY, NY 10004. Telephone: 1-800-753-4824, (212) 908-0500. Fax: (212) 480-4435. Reproduction or retransmission in whole or in part is prohibited except by permission. All rights reserved. In issuing and maintaining its ratings and in making other reports (including forecast information), Fitch relies on factual information it receives from issuers and underwriters and from other sources Fitch believes to be credible. Fitch conducts a reasonable investigation of the factual information relied upon by it in accordance with its ratings methodology, and obtains reasonable verification of that information from independent sources, to the extent such sources are available for a given security or in a given jurisdiction. The manner of Fitch's factual investigation and the scope of the third-party verification it obtains will vary depending on the nature of the rated security and its issuer, the requirements and practices in the jurisdiction in which the rated security is offered and sold and/or the issuer is located, the availability and nature of relevant public information, access to the management of the issuer and its advisers, the availability of pre-existing third-party verifications such as audit reports, agreed-upon procedures letters, appraisals, actuarial reports, engineering reports, legal opinions and other reports provided by third parties, the availability of independent and competent third-party verification sources with respect to the particular security or in the particular jurisdiction of the issuer, and a variety of other factors. Users of Fitch's ratings and reports should understand that neither an enhanced factual investigation nor any third-party verification can ensure that all of the information Fitch relies on in connection with a rating or a report will be accurate and complete. Ultimately, the issuer and its advisers are responsible for the accuracy of the

respect to legal and tax matters. Further, ratings and forecasts of financial and other information are inherently forward-looking and embody assumptions and predictions about future events that by their nature cannot be verified as facts. As a result, despite any verification of current facts, ratings and forecasts can be affected by future events or conditions that were not anticipated at the time a rating or forecast was issued or affirmed.

The information in this report is provided "as is" without any representation or warranty of any kind, and Fitch does not represent or warrant that the report or any of its contents will meet any of the requirements of a recipient of the report. A Fitch rating is an opinion as to the creditworthiness of a security. This opinion and reports made by Fitch are based on established criteria and methodologies that Fitch is continuously evaluating and updating. Therefore, ratings and reports are the collective work product of Fitch and no individual, or group of individuals, is solely responsible for a rating or a report. The rating does not address the risk of loss due to risks other than credit risk, unless such risk is specifically mentioned. Fitch is not engaged in the offer or sale of any security. All Fitch reports have shared authorship. Individuals identified in a Fitch report were involved in, but are not solely responsible for, the opinions stated therein. The individuals are named for contact purposes only. A report providing a Fitch rating is neither a prospectus nor a substitute for the information assembled, verified and presented to investors by the issuer and its agents in connection with the sale of the securities. Ratings may be changed or withdrawn at any time for any reason in the sole discretion of Fitch. Fitch does not provide investment advice of any sort. Ratings are not a recommendation to buy, sell, or hold any security. Ratings do not comment on the adequacy of market price, the suitability of any security for a particular investor, or the tax-exempt nature or taxability of payments made in respect to any security. Fitch receives fees from issuers, insurers, guarantors, other obligors, and underwriters for rating securities. Such fees generally vary from US\$1,000 to US\$750,000 (or the applicable currency equivalent) per issue. In certain cases, Fitch will rate all or a number of issues issued by a particular issuer, or insured or guaranteed by a particular insurer or guarantor, for a single annual fee. Such fees are expected to vary from US\$10,000 to US\$1,500,000 (or the applicable currency equivalent). The assignment, publication, or dissemination of a rating by Fitch shall not constitute a consent by Fitch to use its name as an expert in connection with any registration statement filed under the United States securities laws, the Financial Services and Markets Act of 2000 of the United Kingdom, or the securities laws of any particular jurisdiction. Due to the relative efficiency of electronic publishing and distribution, Fitch research may be available to electronic subscribers up to three days earlier than to print subscribers.

For Australia, New Zealand, Taiwan and South Korea only: Fitch Australia Pty Ltd holds

the Corporations Act 2001

Fitch Ratings, Inc. is registered with the U.S. Securities and Exchange Commission as a Nationally Recognized Statistical Rating Organization (the "NRSRO"). While certain of the NRSRO's credit rating subsidiaries are listed on Item 3 of Form NRSRO and as such are authorized to issue credit ratings on behalf of the NRSRO (see https://www.fitchratings.com/site/regulatory), other credit rating subsidiaries are not listed on Form NRSRO (the "non-NRSROs") and therefore credit ratings issued by those subsidiaries are not issued on behalf of the NRSRO. However, non-NRSRO personnel may participate in determining credit ratings issued by or on behalf of the NRSRO.

READ LESS

SOLICITATION STATUS

The ratings above were solicited and assigned or maintained by Fitch at the request of the rated entity/issuer or a related third party. Any exceptions follow below.

ENDORSEMENT POLICY

Fitch's international credit ratings produced outside the EU or the UK, as the case may be, are endorsed for use by regulated entities within the EU or the UK, respectively, for regulatory purposes, pursuant to the terms of the EU CRA Regulation or the UK Credit Rating Agencies (Amendment etc.) (EU Exit) Regulations 2019, as the case may be. Fitch's approach to endorsement in the EU and the UK can be found on Fitch's Regulatory Affairs page on Fitch's website. The endorsement status of international credit ratings is provided within the entity summary page for each rated entity and in the transaction detail pages for structured finance transactions on the Fitch website. These disclosures are updated on a daily basis.

Structured Finance Structured Finance: RMBS Europe United Kingdom